

BWB:GKS
F. #2016R00461

WEINSTEIN, J.

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

ORENSTEIN, M.J.

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UNITED STATES OF AMERICA

I N D I C T M E N T

- against -

CHRISTOPHER ARROYO,

Defendant.

CR 16 00376

Cr. No. (T. 18, U.S.C., §§ 2251(a), 2251(e),
2252(a)(2), 2252(a)(4)(B), 2252(b)(1),
2252(b)(2), 2253(a) and 3551 *et seq.*; T. 21,
U.S.C., § 853(p))

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THE GRAND JURY CHARGES:

COUNT ONE
(Sexual Exploitation of a Child)

U.S.
DISTRICT
COURT
EASTERN
DISTRICT
OF NEW YORK
2016 JUL -5 PM 3:56
FILED
CLERK

1. In or about and between 2012 and 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CHRISTOPHER ARROYO did knowingly and intentionally employ, use, persuade, induce, entice and coerce a minor, to wit: Jane Doe #1, an individual whose identity is known to the Grand Jury, to engage in sexually explicit conduct for the purpose of producing one or more visual depictions of such conduct, which visual depictions were produced and transmitted using materials that had been mailed, shipped and transported in and affecting interstate and foreign commerce by any means, to wit: computer equipment and mobile telephones, and such visual depictions were actually transported and transmitted using a means and facility of

interstate and foreign commerce, to wit: the Internet and Internet applications, and which were in and affecting interstate and foreign commerce.

(Title 18, United States Code, Sections 2251(a), 2251(e) and 3551 et seq.)

COUNT TWO
(Receipt of Child Pornography)

2. In or about and between 2012 and 2015, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CHRISTOPHER ARROYO did knowingly and intentionally receive one or more visual depictions, to wit: the image depicted in the computer file 10706563_86378595365 5045_1902793332_n.jpg, using a means and facility of interstate and foreign commerce, to wit: the Internet and Internet applications, and which visual depictions had been mailed, shipped and transported in and affecting interstate and foreign commerce, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(2), 2252(b)(1) and 3551 et seq.)

COUNT THREE
(Possession of Child Pornography)

3. In or about and between 2012 and February 2016, both dates being approximate and inclusive, within the Eastern District of New York and elsewhere, the defendant CHRISTOPHER ARROYO did knowingly and intentionally possess matter containing one or more visual depictions, to wit: images in digital files, which visual depictions had been mailed, shipped and transported using a means and facility of interstate and foreign commerce, to wit: the Internet and Internet applications, and which were produced

using materials which had been mailed, and so shipped and transported by any means, including by computer, the production of such visual depictions having involved the use of one or more minors engaging in sexually explicit conduct, and such visual depictions were of such conduct.

(Title 18, United States Code, Sections 2252(a)(4)(B), 2252(b)(2) and 3551 et seq.)

CRIMINAL FORFEITURE ALLEGATION AS TO COUNTS ONE THROUGH THREE

4. The United States hereby gives notice to the defendant that, upon his conviction of any of the offenses charged in Counts One through Three, the government will seek forfeiture in accordance with Title 18, United States Code, Section 2253(a), of (a) any visual depiction described in section 2251, 2251A, 2252, 2252A, 2252B or 2260 of Title 18, United States Code, or any book, magazine, periodical, film, videotape or other matter which contains any such visual depiction, which was produced, transported, mailed, shipped or received in violation of such sections; (b) any property, real or personal, constituting or traceable to gross profits or other proceeds obtained from the offense(s) of conviction; and (c) any property, real or personal, used or intended to be used to commit or to promote the commission of the offense(s) of conviction or any property traceable to such property, including but not limited to the following properties:

- a. one Toshiba Laptop, serial number 9D053762S;
- b. one Nintendo Wii with SanDisk USB 8GB, serial number GW400570998;
- c. one Xbox 360 HDD Console, serial number 416713661705;

- d. one Fujitsu hard drive, model number MHW2040BH, serial number K11LT792KFDM;
- e. one PNY thumb drive 64GB;
- f. one Huawei My Touch cell phone – IMEI 861148011492910, serial number C527NC9370302567;
- g. one Xbox One Console, serial number 044637451048; and
- h. one Xbox Console, serial number 04329242806,

all of which were seized from a residence located in Forest Hills, New York, on or about February 25, 2016 (the “Seized Assets”).

5. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be divided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p), to

seek forfeiture of any other property of the defendant up to the value of the forfeitable property described in this forfeiture allegation.

(Title 18, United States Code, Section 2253(a); Title 21, United States Code, Section 853(p))

A TRUE BILL



FOREPERSON



ROBERT L. CAPERS
UNITED STATES ATTORNEY
EASTERN DISTRICT OF NEW YORK

F. #2016R0461

No. _____

UNITED STATES DISTRICT COURT

EASTERN *District of* NEW YORK

CRIMINAL DIVISION

THE UNITED STATES OF AMERICA

vs.

CHRISTOPHER ARROYO,

Defendant.

INDICTMENT

(T. 18, U.S.C., §§ 2251(a), 2251(e), 2252(a)(2), 2252(a)(4)(B),
2252(b)(1), 2252(b)(2), 2253(a) and 3551 *et seq.*; T. 21, U.S.C., §
853(p))

A true bill.

Foreperson

Filed in open court this _____ day,

of _____ A.D. 20 _____

Clerk

Bail, \$ _____

G. Karthik Srinivasan, Assistant U.S. Attorney (718) 254-6013